



Consumer Federation of America

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EX PARTE

May 18, 2005

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**RE: *Ex Parte* Correspondence - IP-Enabled Services, WC Docket No.
04-36**

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission's ("Commission") Rules, this letter serves to provide notice in the above-captioned proceeding of an *ex parte* communication on May 12, 2005, in which I, Mark Cooper, in my capacity as Director of Research, Consumer Federation of America (CFA), transmitted via facsimile a writing to Chairman Martin and Commissioners Abernathy, Copps and Adelstein in which I detailed CFA's concerns relating to the above-captioned proceeding, namely the deployment of Enhanced 911 (E-911).

Specifically, CFA noted the importance of the Commission requiring that E-911 be deployed for all communications services, including Internet phone service; but, that the Commission also require ILECs to afford access to companies providing Internet phone service to the underlying facilities and databases on a competitively neutral and non-discriminatory basis, and at reasonable prices.

CFA further noted the existence of technical questions as to how Voice Over Internet Protocol (VoIP) can meet social and public policy requirements placed on telecommunications services (such as provision of E-911), and that these telecommunications services ought to have the opportunity to develop solutions to the technical problems. We further argued that the Commission should make it clear that VoIP services, which are classified as telecommunications services, be required to meet the public interest obligations the 1996 Telecommunications Act imposes on such services, both ensuring that consumers receive the services that Congress intended, and creating an obligation on the part of E-911 and other authorities to take the steps necessary to support VoIP provision of the service.

Finally, CFA noted that whatever timeframe the Commission uses for the adoption of E-911 service, it should recognize that current service will be implemented into a patchwork system; and that it must further ensure that after that milestone, we need to move toward a technically superior system going forward.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Mark Cooper", with a stylized, flowing script.

Mark Cooper, Director of Research